

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

In Re: LATOYA S. LEWERS

**CHAPTER 13
NO: 11-12178 DWH**

RESPONSE TO TRUSTEE'S OBJECTION TO CONFIRMATION

COMES NOW, LATOYA S. LEWERS, Debtor in the above styled and numbered cause, by and through undersigned counsel, and files this her Response to Trustee's Objection to Confirmation (Dk #19), respectfully showing unto the Court as follows:

1. The allegations of paragraph one of the Objection are admitted.
2. The allegations of paragraph two of the Objection are admitted; however, the Debtor asserts that the vehicle was totaled after the plan was filed, and she will amend the plan once the amount of insurance that will be paid and the payoff amount of the loan secured by that vehicle is determined.
3. The allegations of paragraph three of the Objection are denied.
4. The allegations of paragraph four of the Objection are denied. The Trustee cannot object to an amended plan that deletes the provision for payment of the vehicle since that is what the Trustee is requesting be done.

WHEREFORE, Debtor pray that upon a hearing hereon, this Court will enter its Order overruling the Trustee's Objection to Confirmation and confirm the Chapter 13 Plan as proposed or any amended plan that may be submitted by the Debtor. Debtor prays for such other, further and general relief to which she may be entitled.

Respectfully Submitted,
LATOYA S. LEWERS, Debtor

By: /s/ Robert Gambrell
ROBERT GAMBRELL, Atty for Debtor

CERTIFICATE OF SERVICE

I, ROBERT GAMBRELL, Attorney for the above listed Debtor, do hereby certify that the following have been served electronically via ECF the above Response to Trustee's Objection to Confirmation:

Henry G. Hobbs, Jr.: Acting U. S. Trustee: USTPRegion05.JA.ECF@usdoj.gov
Locke D. Barkley, Chapter 13 Trustee: sbeasley@barkley13.com

This the 20th day of July, 2011.

/s/ Robert Gambrell
ROBERT GAMBRELL
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